



**HELEN F. DALTON & ASSOCIATES, P.C.**  
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**APPLICATION GRANTED**  
**SO ORDERED** *Vern Broderick*  
**VERNON S. BRODERICK**  
**U.S.D.J.** 9/29/23

**Via ECF:**

The Honorable Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: **Morrison et al v. JSP Life Agency Inc. et. al.**  
Civil Docket No.: 1:23-cv-06943-VSB

Dear Judge Broderick:

Our office represents the Plaintiff, Lindon Morrison, individually and on behalf of all others similarly situated ("Plaintiff") in this FLSA Action, and we respectfully submit this letter motion, jointly with the counsel for the Defendants, to request the Court that the joint letter and case management plan due today pursuant to the Court's Order dated September 14, 2023 (*Dkt. No. 14*), be extended to a date following the parties' mediation.

The parties are set for a conference call with mediator Davida Perry, tomorrow, September 29, 2023, to schedule the mediation date. Once we agree upon the date, we shall apprise the Court of the mediation and the proposed date for filing the joint letter and case management plan and if the case does not settle.

This is the parties first request for an extension of this deadline and this request will not affect any other dates or deadlines.

We thank The Court for its kind consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

*Roman Avshalumov*  
Roman Avshalumov, Esq.

CC via ecf:

*Attorneys for Defendants*